## IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

Leila Green Little, et al.,	§ §
Plaintiffs,	§ Civil Action No. 1:22-cv-00424-RP
v.	§ [PROPOSED] ORDER GRANTING
Llano County, et al.,	§ PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES
Defendants.	§ § §

The Court, having reviewed all materials submitted in support of Plaintiffs' Motion to Compel Discovery Responses, and all other pleadings and arguments by counsel properly before the Court, and after careful consideration, hereby **GRANTS** Plaintiffs' Motion, and **ORDERS**:

- 1. Defendants to respond fully to Plaintiffs' May 11 RFPs within two weeks of this Order;
- 2. Defendants to respond fully to Plaintiffs' September 14 RFPs and interrogatories within two weeks of this Order;
- 3. Defendants to comply with the parties' agreed-to ESI protocol when producing documents, and if Defendants are unable to do so, the parties will choose a neutral, third-party vendor for collection and production, at Defendants' cost;
- 4. After responding to Plaintiffs' discovery requests, each Individual Defendant must certify that (i) he or she searched every one of his or her email addresses, telephones, social media applications, and messaging applications for relevant communications, (ii) no additional

accounts exist, and (iii) he or she produced every responsive document to counsel via Dropbox or similar application so that Defendants' counsel can produce those documents in native format.

- 5. Plaintiffs are permitted to submit subsequently produced documents to the Court for review in connection with Plaintiffs' Motion for a Preliminary Injunction, and Defendants may not rebut or attempt to rebut the submission of such evidence;
- 6. Plaintiffs may re-depose Defendants based on information gleaned from subsequently produced documents, at Defendant's' costs; and
- 7. Defendants to pay \$5,415 in reasonable costs and fees in connection with the instant motion, as set forth in the accompanying Declaration of Max Bernstein.

IT IS SO ORDERED.

Dated:	
	Hon. Robert Pitman
	United States District Judge